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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION

UNITED STATES OF AMERICA	:	SEALED INDICTMENT
	:	
vs.	:	CRIMINAL NO. 7:20-CR-
	:	
JAYSON E. WRIGHT	:	VIOLATIONS:
	:	18 U.S.C. § 2251(a)
and	:	18 U.S.C. § 2251(b)
	:	18 U.S.C. § 2251(e)
KARA E. WRIGHT,	:	18 U.S.C. § 2

THE GRAND JURY CHARGES:

COUNT ONE
PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. §§2251(b) and (e)

That on or about March 11, 2018, in the Valdosta Division of the Middle District of Georgia, the defendants,

JAYSON E. WRIGHT, and
KARA E. WRIGHT,

each being the parent of Minor Victim #1, a minor whose identity is known to the Grand Jury, knowingly permitted Minor Victim #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(b) and (e) and Title 18, United States Code, Section 2.

COUNT TWO
PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. §§2251(b) and (e)

That on or about February 9, 2019, in the Valdosta Division of the Middle District of Georgia, the defendants,

JAYSON E. WRIGHT, and
KARA E. WRIGHT,

each being the parent of Minor Victim #1, a minor whose identity is known to the Grand Jury, knowingly permitted Minor Victim #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(b) and (e) and Title 18, United States Code, Section 2.

COUNT THREE
PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. §§2251(b) and (e)

That on or about January 15, 2020, in the Valdosta Division of the Middle District of Georgia, the defendants,

JAYSON E. WRIGHT, and
KARA E. WRIGHT,

each being the parent of Minor Victim #1, a minor whose identity is known to the Grand Jury, knowingly permitted Minor Victim #1 to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(b) and (e) and Title 18, United States Code, Section 2.

COUNT FOUR
PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. §§2251(a) and (e)

That on or about June 5, 2018, in the Valdosta Division of the Middle District of Georgia, the defendant,

JAYSON E. WRIGHT,

did employ, use, induce, entice and coerce and attempt to employ, use, induce, entice and coerce Minor Victim #2, a minor whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using material that had been mailed, shipped, and transported in interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT FIVE
PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. §§2251(a) and (e)

That on or about July 2, 2018, in the Valdosta Division of the Middle District of Georgia, the defendant,

JAYSON E. WRIGHT,

did employ, use, induce, entice and coerce and attempt to employ, use, induce, entice and coerce Minor Victim #3, a minor whose identity is known to the Grand Jury, in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using material that had been mailed, shipped, and transported in interstate or foreign commerce, by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT SIX
PRODUCTION OF CHILD PORNOGRAPHY
18 U.S.C. §§2251(a) and (e)

Beginning on a time unknown to the Grand Jury but at least during August 2019, in the Valdosta Division of the Middle District of Georgia, the defendant,

JAYSON E. WRIGHT,

did employ, use, induce, entice and coerce and attempt to employ, use, induce, entice and coerce Minor Victim #4 and Minor Victim #1, minors whose identities are known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using material that had been mailed, shipped, and transported in interstate or foreign commerce by any means, including a computer.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

FORFEITURE NOTICE
(18 U.S.C. § 2253 - Criminal Forfeiture)

1. The allegations contained in Counts One through Six of this Indictment are hereby re-alleged and incorporated by reference into this Notice for the purpose of alleging forfeiture to the United States of America, pursuant to the provisions of Title 18, United States Code, Section 2253.

2. Upon conviction of the offense(s) in violation of Title 18, United States Code, Sections 2251(a), (b) and (e), set forth in Counts through Fourteen of this Indictment, the defendant(s), **JAYSON E. WRIGHT, and KARA E. WRIGHT**, shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 2253:

- (a) Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine,

periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;

- (b) Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense(s); and
- (c) Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense(s), or any property traceable to such property.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon exercise of due diligence;
- (b) has been transferred, sold to or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All pursuant to 18 U.S.C. § 2253.

A TRUE BILL.


/s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

Presented by:

CHARLES E. PEELER
UNITED STATES ATTORNEY


KATELYN SEMALES
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 15 day of September, 2020.


Deputy Clerk